

EXHIBIT 2

Melanie Hesano

From: Melanie Hesano
Sent: Wednesday, February 3, 2021 2:40 PM
To: 'Steve Drew'; Kathryn Boyd; Carla Jo Compton; Adam Sturdivant
Cc: Laura Amtsbuechler; Julie Doll
Subject: FW: Heethuis v Muskegon County, et. al
Attachments: 2021-01-13 Ltr to OC re Facebook Deficiencies.pdf

Steve:

I have not received a response regarding my 01/13/2021 letter regarding Facebook deficiencies. We also have not received any additional Facebook messages that have been promised. When can we expect the remaining Facebook messages?

Furthermore, we need to choose a time and place for our forensic expert to conduct the forensic imaging of Plaintiff and her husband's cell phones. Our expert is based in Troy, MI. We can potentially use our Lansing office as the place to conduct the imaging. Please give me a call so we can determine the best course of action regarding this. We need this accomplished as soon as possible.

Thanks,

Melanie



Melanie Hesano
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From: Melanie Hesano
Sent: Wednesday, January 13, 2021 10:31 AM
To: Steve Drew <sdrew@dca-lawyers.com>; Adam Sturdivant <asturdivant@dca-lawyers.com>; Kathryn Boyd <kboyd@dca-lawyers.com>; Carla Jo Compton <ccompton@dca-lawyers.com>; Robika Garner <rgarner@dca-lawyers.com>
Cc: Laura Amtsbuechler <lamtsbuechler@rsjalaw.com>; Julie Doll <jdoll@rsjalaw.com>
Subject: Heethuis v Muskegon County, et. al

Steve:

Please see attached correspondence regarding Facebook deficiencies. Also, I will be speaking to our forensic expert tomorrow regarding the phone inspection to explain the Magistrate's ruling and to help with the procedures to extract specific information from the cell phones that we will incorporate into the joint protective order. Are you available to speak tomorrow so we can get going on the joint protective order? I am available tomorrow anytime after 11am.



ROSATI | SCHULTZ
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Melanie Hesano

From: Melanie Hesano
Sent: Monday, February 8, 2021 1:23 PM
To: Steve Drew; Adam Sturdivant; Carla Jo Compton; Kathryn Boyd; Robika Garner
Cc: Laura Amtsbuechler; Julie Doll
Subject: Heethuis v Muskegon County, et. al.

Steve:

Discovery is set to close one week from today, 2/15/2021. Per my correspondence to you last week, we need to set up a time and place for the forensic imaging of the cell phones. I would like this done as soon as possible so there is a sufficient amount of time for both parties to review the phone contents prior to the Motion for Summary Judgment deadline.

Again, we have not received the additional Facebook messages as promised. We did not argue about the production of Plaintiff's Facebook content during the hearing regarding my motion to compel because you provided written confirmation that we will be receiving the Facebook messages in batches. You also indicated that intent to Magistrate Judge Grand. To date, we've only received one batch of overly redacted Facebook messages; which was sent to us on 01/08/21. Please refer to my deficiency letter. If necessary, I will file a motion to compel.

Lastly, to date, we have not received Plaintiff's signed and notarized copies of any discovery responses you have submitted on her behalf. Please forward signed and notarized copies of her responses.

My cell phone is 248-408-9525.

Melanie



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Melanie Hesano

From: Melanie Hesano
Sent: Friday, February 12, 2021 10:11 AM
To: Steve Drew; Kathryn Boyd; Carla Jo Compton; Robika Garner; Adam Sturdivant
Cc: Julie Doll; Laura Amtsbuechler
Subject: Heethuis v Muskegon County

Good Morning:

On Monday, Jeremy Dinsmore from N1 Discovery will arrive at your office around 9:45 a.m. (to set up) to simultaneously perform the forensic imaging of both Lori and Damon Heethuis' cell phones. He asks that appropriate social distancing measures be taken. Will Mr. Dinsmore be in a conference room? Also, as a reminder, please make sure both Lori and Damon are able to provide their cloud account information to Mr. Dinsmore on Monday.

We will be on the lookout today for the remaining Facebook messages, as promised.

Thank you,
Melanie



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